

Kulleberg

BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DIRECTOR OF UTILITIES

IN THE MATTER OF ILEC UNBUNDLING
OBLIGATIONS AS A RESULT OF THE
FEDERAL TRIENNIAL REVIEW ORDER.

Docket No. T-00000A-03-0369

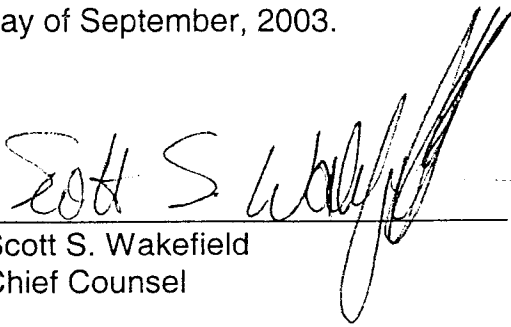
RUCO'S COMMENTS

On June 4, 2003, the Arizona Corporation Commission ("Commission") opened a generic docket to consider incumbent local exchange carrier unbundling obligations resulting from the Federal Communications Commission's ("FCC") Triennial Review Order. On June 24, 2003, the Commission issued a Procedural Order ordering interested parties to file comments on a number of procedural questions relating to the matter within 20 days following the release of the FCC's Order. On August 21, 2003, the FCC released its Order. RUCO provides the following comments in response to the questions set forth in the Commission's Procedural Order.

RUCO's primary focus will be on the 9-month proceeding. However, RUCO will monitor the 90-day proceeding, and to the extent issues that affect both the 90-day and 9-month proceedings are considered in the 90-day proceeding, RUCO may participate in the 90-day proceeding. RUCO has no comments on the questions regarding the 90-day proceeding.

1 With respect to the 9-month proceeding, RUCO believes that a paper comment
2 process may be sufficient, unless parties contest the data made available to the
3 Commission.

4 RESPECTFULLY SUBMITTED this 10th day of September, 2003.

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7 _____
8 Scott S. Wakefield
9 Chief Counsel
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1 AN ORIGINAL AND THIRTEEN COPIES
2 of the foregoing filed this 10th day
3 of September, 2003 with:

4 Docket Control
5 Arizona Corporation Commission
6 1200 West Washington
7 Phoenix, Arizona 85007

8 COPIES of the foregoing hand delivered/
9 mailed this 10th day of September, 2003 to:

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